

Exhibit B

Zachary Furcolo

From: Wizenfeld, Charles (US) <charles.wizenfeld@us.kwm.com>
Sent: Thursday, July 6, 2023 6:06 PM
To: Ray Zado; Ogi Zivojnovic
Cc: Pacelli, Andrea (US); Kevin Johnson; Sam Stake; James Judah; QE-AIT-Salesforce; lgoddard@mcdonaldcarano.com; jfrankovich@mcdonaldcarano.com; AIT; Michael A. Burke; Monica Wilmoth; Steve Sereboff
Subject: RE: 3:13-cv-00628-RCJ-CLB AIT v. Salesforce - Service of proposed order

[EXTERNAL EMAIL from charles.wizenfeld@us.kwm.com]

Thanks Ray - that proposal works for AIT. We'll draft up a stipulation and get it to you for review.

Regards,
Charles

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From: Ray Zado <rayzado@quinnemanuel.com>
Sent: Thursday, July 6, 2023 8:58 PM
To: Wizenfeld, Charles (US) <charles.wizenfeld@us.kwm.com>; Ogi Zivojnovic <ogizivojnovic@quinnemanuel.com>
Cc: Pacelli, Andrea (US) <Andrea.Pacelli@us.kwm.com>; Kevin Johnson <kevinjohnson@quinnemanuel.com>; Sam Stake <samstake@quinnemanuel.com>; James Judah <jamesjudah@quinnemanuel.com>; QE-AIT-Salesforce <qe-ait-salesforce@quinnemanuel.com>; lgoddard@mcdonaldcarano.com; jfrankovich@mcdonaldcarano.com; AIT <AIT@us.kwm.com>; Michael A. Burke <mburke@rssblaw.com>; Monica Wilmoth <mwilmoth@rssblaw.com>; Steve Sereboff <SSereboff@socalip.com>
Subject: RE: 3:13-cv-00628-RCJ-CLB AIT v. Salesforce - Service of proposed order

Hi Charles,

I apologize, the 13th in that email was a typo (I transposed the 10th that you asked for AIT's deadline with the 13th that was Salesforce's deadline), but of course we will not go back on that offer. With that understanding, here are the revised dates (with the same understandings as to meet and confers and revisions below):

AIT submission: 7/13
Meet and confer: no later than 7/17
Salesforce's submission of final PO: 7/21

From: Wizenfeld, Charles (US) [<mailto:charles.wizenfeld@us.kwm.com>]

Sent: Thursday, July 6, 2023 5:45 PM

To: Ray Zado <rayzado@quinnemanuel.com>; Ogi Zivojnovic <ogizivojnovic@quinnemanuel.com>

Cc: Pacelli, Andrea (US) <Andrea.Pacelli@us.kwm.com>; Kevin Johnson <kevinjohnson@quinnemanuel.com>; Sam Stake <samstake@quinnemanuel.com>; James Judah <jamesjudah@quinnemanuel.com>; QE-AIT-Salesforce <qe-ait-salesforce@quinnemanuel.com>; lgoddard@mcdonaldcarano.com; jfrankovich@mcdonaldcarano.com; AIT <AIT@us.kwm.com>; Michael A. Burke <mburke@rssblaw.com>; Monica Wilmoth <mwilmoth@rssblaw.com>; Steve Sereboff <ssereboff@socalip.com>

Subject: RE: 3:13-cv-00628-RCJ-CLB AIT v. Salesforce - Service of proposed order

[EXTERNAL EMAIL from charles.wizenfeld@us.kwm.com]

Ray, in your email yesterday, you said Salesforce would agree for AIT's deadline to file its objections to be moved to the 13th in exchange for building in time for the parties to meet and confer and for Salesforce to have extra time to address AIT's objections. We agreed to that concept yesterday. Given your indication that would be acceptable yesterday, we hope it has not become an issue. Please confirm that moving the AIT objection deadline to the 13th still works and we can build in the subsequent deadlines similar to the timeframe you suggest in your latest email, but if not please give me a call tonight so we can work something out. I'll be available for the next couple of hours at 646-765-0261. Thanks.

Regards,
Charles

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From: Ray Zado <rayzado@quinnemanuel.com>

Sent: Thursday, July 6, 2023 7:19 PM

To: Wizenfeld, Charles (US) <charles.wizenfeld@us.kwm.com>; Ogi Zivojnovic <ogizivojnovic@quinnemanuel.com>

Cc: Pacelli, Andrea (US) <Andrea.Pacelli@us.kwm.com>; Kevin Johnson <kevinjohnson@quinnemanuel.com>; Sam Stake <samstake@quinnemanuel.com>; James Judah <jamesjudah@quinnemanuel.com>; QE-AIT-Salesforce <qe-ait-salesforce@quinnemanuel.com>; lgoddard@mcdonaldcarano.com; jfrankovich@mcdonaldcarano.com; AIT <AIT@us.kwm.com>; Michael A. Burke <mburke@rssblaw.com>; Monica Wilmoth <mwilmoth@rssblaw.com>; Steve Sereboff <ssereboff@socalip.com>

Subject: RE: 3:13-cv-00628-RCJ-CLB AIT v. Salesforce - Service of proposed order

Charles,

Re the dates, we would propose Monday the 10th for AIT's objections (as requested), a meet and confer by Wednesday the 12th, (with additional meet and confers as necessary), and service of the final PO on the 17th, with the specific understanding that Salesforce can revise the PO in that period of time (as we expect AIT will have objections that may need to be addressed).

Regards,

Ray

Ray Zado

Partner,

Quinn Emanuel Urquhart & Sullivan, LLP

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From: Wizenfeld, Charles (US) [<mailto:charles.wizenfeld@us.kwm.com>]

Sent: Thursday, July 6, 2023 10:10 AM

To: Ray Zado <rayzado@quinnemanuel.com>; Ogi Zivojnovic <ogizivojnovic@quinnemanuel.com>

Cc: Pacelli, Andrea (US) <Andrea.Pacelli@us.kwm.com>; Kevin Johnson <kevinjohnson@quinnemanuel.com>; Sam Stake <samstake@quinnemanuel.com>; James Judah <jamesjudah@quinnemanuel.com>; QE-AIT-Salesforce <qe-ait-salesforce@quinnemanuel.com>; lgoddard@mcdonaldcarano.com; jfrankovich@mcdonaldcarano.com; AIT <AIT@us.kwm.com>; Michael A. Burke <mburke@rssblaw.com>; Monica Wilmoth <mwilmoth@rssblaw.com>; Steve Sereboff <SSereboff@socalip.com>

Subject: RE: 3:13-cv-00628-RCJ-CLB AIT v. Salesforce - Service of proposed order

[EXTERNAL EMAIL from charles.wizenfeld@us.kwm.com]

Ray, we didn't see a follow up email from you on specific proposed dates yesterday. Can you please send your full proposal, as we'd like to get a stipulation on file by tomorrow to at least push off AIT's current deadline for objections to next week. Per your suggestion, AIT agrees in principle to adding a couple extra days to the process to facilitate agreement. Thanks.

Regards,
Charles

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From: Ray Zado <rayzado@quinnemanuel.com>

Sent: Wednesday, July 5, 2023 5:17 PM

To: Wizenfeld, Charles (US) <charles.wizenfeld@us.kwm.com>; Ogi Zivojnovic <ogizivojnovic@quinnemanuel.com>

Cc: Pacelli, Andrea (US) <Andrea.Pacelli@us.kwm.com>; Kevin Johnson <kevinjohnson@quinnemanuel.com>; Sam Stake <samstake@quinnemanuel.com>; James Judah <jamesjudah@quinnemanuel.com>; QE-AIT-Salesforce <qe-ait-salesforce@quinnemanuel.com>; lgoddard@mcdonaldcarano.com; jfrankovich@mcdonaldcarano.com; AIT <AIT@us.kwm.com>; Michael A. Burke <mburke@rssblaw.com>; Monica Wilmoth <mwilmoth@rssblaw.com>; Steve Sereboff <ssereboff@socalip.com>

Subject: RE: 3:13-cv-00628-RCJ-CLB AIT v. Salesforce - Service of proposed order

Charles,

We agree in principle to the proposed extension, provided that it incorporates the ability of the parties to meet and confer and substantively attempt to resolve objections and disputes before service of the final proposed order (as we believe you to be proposing below). We will get back to you today on specific dates, but as a precursor, we would agree to AIT having until the 13th for serve its objections; however, we may want to build in a couple additional days for the meet and confer process.

Regards,

Ray

From: Wizenfeld, Charles (US) [<mailto:charles.wizenfeld@us.kwm.com>]

Sent: Tuesday, July 4, 2023 10:52 AM

To: Ogi Zivojnovic <ogizivojnovic@quinnemanuel.com>

Cc: Pacelli, Andrea (US) <Andrea.Pacelli@us.kwm.com>; Ray Zado <rayzado@quinnemanuel.com>; Kevin Johnson <kevinjohnson@quinnemanuel.com>; Sam Stake <samstake@quinnemanuel.com>; James Judah <jamesjudah@quinnemanuel.com>; QE-AIT-Salesforce <qe-ait-salesforce@quinnemanuel.com>; lgoddard@mcdonaldcarano.com; jfrankovich@mcdonaldcarano.com; AIT <AIT@us.kwm.com>; Michael A. Burke <mburke@rssblaw.com>; Monica Wilmoth <mwilmoth@rssblaw.com>; Steve Sereboff <ssereboff@socalip.com>

Subject: RE: 3:13-cv-00628-RCJ-CLB AIT v. Salesforce - Service of proposed order

[EXTERNAL EMAIL from charles.wizenfeld@us.kwm.com]

Counsel, further to my below email, AIT requests a brief extension of service of AIT's objections to Monday, July 10. In turn, AIT would agree to extend the deadline for Salesforce's filing until Thursday, July 13. This would allow the parties time to meet and confer, react and potentially resolve issues consistent with the extension the parties agreed to for purposes of service of Salesforce's proposed order. In addition, with today being July 4th, the short extension would be appreciated. Please promptly let us know either way. Thanks.

Regards and have a happy Holiday.
Charles

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From: Wizenfeld, Charles (US) <charles.wizenfeld@us.kwm.com>
Sent: Tuesday, July 4, 2023 10:49 AM
To: Ogi Zivojnovic <ogizivojnovic@quinnemanuel.com>
Cc: Pacelli, Andrea (US) <Andrea.Pacelli@us.kwm.com>; Ray Zado <rayzado@quinnemanuel.com>; Kevin Johnson <kevinjohnson@quinnemanuel.com>; Sam Stake <samstake@quinnemanuel.com>; James Judah <jamesjudah@quinnemanuel.com>; QE-AIT-Salesforce <qe-ait-salesforce@quinnemanuel.com>; lgoddard@mcdonaldcarano.com; jfrankovich@mcdonaldcarano.com; AIT <AIT@us.kwm.com>; Michael A. Burke <mburke@rssblaw.com>; Monica Wilmoth <mwilmoth@rssblaw.com>; Steve Sereboff <SSereboff@socalip.com>
Subject: Re: 3:13-cv-00628-RCJ-CLB AIT v. Salesforce - Service of proposed order

Ogi - thanks for providing the draft this morning. Is there any Salesforce confidential information in the draft? If so can you please identify it, as we'd like to share the draft with our client. Thanks.

Regards,
Charles

On Jul 4, 2023, at 5:57 AM, Ogi Zivojnovic <ogizivojnovic@quinnemanuel.com> wrote:

Counsel,

Please find attached Salesforce's draft Proposed Order. Salesforce reserves the right to modify the draft Proposed Order based on any "reason for disapproval" identified by AIT pursuant to LR 7-2(f).

Best,
Ogi

From: Pacelli, Andrea (US) <Andrea.Pacelli@us.kwm.com>
Sent: Friday, June 23, 2023 9:32 AM
To: Ray Zado <rayzado@quinnemanuel.com>; Kevin Johnson <kevinjohnson@quinnemanuel.com>; Sam Stake <samstake@quinnemanuel.com>; James Judah <jamesjudah@quinnemanuel.com>
Cc: QE-AIT-Salesforce <qe-ait-salesforce@quinnemanuel.com>; lgoddard@mcdonaldcarano.com; jfrankovich@mcdonaldcarano.com; AIT <AIT@us.kwm.com>; Michael A. Burke <mburke@rssblaw.com>; Monica Wilmoth <mwilmoth@rssblaw.com>; Steve Sereboff <SSereboff@socalip.com>
Subject: RE: 3:13-cv-00628-RCJ-CLB AIT v. Salesforce - Service of proposed order

[EXTERNAL EMAIL from andrea.pacelli@us.kwm.com]

Ray,

Thanks for sending the draft. You have our permission to file with the minor edits in the attached.

Best regards,
Andrea

From: Ray Zado <rayzado@quinnemanuel.com>
Sent: Friday, June 23, 2023 12:01 PM
To: Pacelli, Andrea (US) <Andrea.Pacelli@us.kwm.com>; Kevin Johnson

<kevinjohnson@quinnemanuel.com>; Sam Stake <samstake@quinnemanuel.com>; James Judah <jamesjudah@quinnemanuel.com>

Cc: QE-AIT-Salesforce <qe-ait-salesforce@quinnemanuel.com>; lgoddard@mcdonaldcarano.com; jfrankovich@mcdonaldcarano.com; AIT <AIT@us.kwm.com>; Michael A. Burke <mburke@rssblaw.com>; Monica Wilmoth <mwilmoth@rssblaw.com>; Steve Sereboff <SSereboff@socalip.com>

Subject: RE: 3:13-cv-00628-RCJ-CLB AIT v. Salesforce - Service of proposed order

Andrea,

Further to the below, please see the attached.

Regards,

Ray

Ray Zado

Partner,

Quinn Emanuel Urquhart & Sullivan, LLP

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From: Pacelli, Andrea (US) [<mailto:Andrea.Pacelli@us.kwm.com>]

Sent: Thursday, June 22, 2023 1:37 PM

To: Ray Zado <rayzado@quinnemanuel.com>; Kevin Johnson <kevinjohnson@quinnemanuel.com>; Sam Stake <samstake@quinnemanuel.com>; James Judah <jamesjudah@quinnemanuel.com>

Cc: QE-AIT-Salesforce <qe-ait-salesforce@quinnemanuel.com>; lgoddard@mcdonaldcarano.com; jfrankovich@mcdonaldcarano.com; AIT <AIT@us.kwm.com>; Michael A. Burke <mburke@rssblaw.com>; Monica Wilmoth <mwilmoth@rssblaw.com>; Steve Sereboff <SSereboff@socalip.com>

Subject: RE: 3:13-cv-00628-RCJ-CLB AIT v. Salesforce - Service of proposed order

[EXTERNAL EMAIL from andrea.pacelli@us.kwm.com]

Ray,

AIT agrees to the extension. Please circulate a draft joint request.

Best regards,
Andrea

From: Ray Zado <rayzado@quinnemanuel.com>
Sent: Thursday, June 22, 2023 12:15 PM
To: Pacelli, Andrea (US) <Andrea.Pacelli@us.kwm.com>; Kevin Johnson <kevinjohnson@quinnemanuel.com>; Sam Stake <samstake@quinnemanuel.com>; James Judah <jamesjudah@quinnemanuel.com>
Cc: QE-AIT-Salesforce <qe-ait-salesforce@quinnemanuel.com>; lgoddard@mcdonaldcarano.com; jfrankovich@mcdonaldcarano.com; AIT <AIT@us.kwm.com>; Michael A. Burke <mburke@rssblaw.com>; Monica Wilmoth <mwilmoth@rssblaw.com>; Steve Sereboff <SSereboff@socalip.com>
Subject: RE: 3:13-cv-00628-RCJ-CLB AIT v. Salesforce - Service of proposed order

Andrea,

Further to the below, we had intended to serve the proposed order on the 23rd in accordance with LR 7-2(f). However, we understand the basis of your request. Accordingly, we would propose a joint request to the Court for a 2 week extension to the deadline to submit the PO, wherein Salesforce would serve the PO at least a week in advance for your review.

Please let us know if this proposal is acceptable to AIT.

Regards.

Ray

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From: Pacelli, Andrea (US) [<mailto:Andrea.Pacelli@us.kwm.com>]
Sent: Thursday, June 15, 2023 3:11 PM
To: Kevin Johnson <kevinjohnson@quinnemanuel.com>; Ray Zado <rayzado@quinnemanuel.com>; Sam Stake <samstake@quinnemanuel.com>; James Judah <jamesjudah@quinnemanuel.com>
Cc: QE-AIT-Salesforce <qe-ait-salesforce@quinnemanuel.com>; lgoddard@mcdonaldcarano.com; jfrankovich@mcdonaldcarano.com; AIT <AIT@us.kwm.com>; Michael A. Burke <mburke@rssblaw.com>; Monica Wilmoth <mwilmoth@rssblaw.com>; Steve Sereboff <SSereboff@socalip.com>
Subject: 3:13-cv-00628-RCJ-CLB AIT v. Salesforce - Service of proposed order

[EXTERNAL EMAIL from andrea.pacelli@us.kwm.com]

Counsel:

Pursuant to LR 7-2(f), Salesforce must serve its proposed order on AIT at least three days prior to the June 26, 2023 deadline set by the Court (ECF 394) so that AIT's position may be noted in the filing of the proposed order. In view of the fact that June 26 is a Monday, we ask that Salesforce serve its proposed order on AIT early enough to allow the parties to resolve any disagreements in advance of the Court's deadline. We are generally available to discuss.

Best regards,
Andrea

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<Proposed MSJ Order.DOCX>